

RCRA HAZARDOUS WASTE GENERATOR COMPLIANCE EVALUATION INSPECTION CHECKLIST

Company: ASHTA Chemicals, Inc. EPA I.D.: 040 980 793 301
 Street: 3509 Middle Road PO Box 858 City: Ashtabula
 County: Ashtabula State: Ohio Zip: 44005-0858

Mailing Address: _____
 (IF DIFFERENT FROM ABOVE)

Telephone: 440 997 6881 Fax: 440 997 0286

Owner/Operator: _____
 (IF DIFFERENT FROM ABOVE)

Street: _____

City: _____ State: _____ Zip: _____

Inspection Date(s): June 24-2599 Time(s): 10:30 - 5

Inspection announced? Yes _____ No _____ If so, how much advance notice given? _____

Name	Affiliation	Telephone
Inspectors: <u>Michael Beedle</u>	<u>RCRA</u>	<u>also present Mark Maloney</u>
		<u>216 522 7260</u>
		<u>312 353 7122</u>

Facility Rep(s): John Reese
Andrew Laiter

GENERATOR CLASSIFICATION

WASTE MANAGEMENT ACTIVITY

<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers -
<input type="checkbox"/> Small Quantity Generator (SQG)	<input checked="" type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Other (specify) <u>rolloff box</u>
<input type="checkbox"/> No Generation	

CESQG: < 100 Kg (approx. 25-30 gallons) of waste in a calendar month

SQG: between 100 and 1000 Kg (about 25 to under 300 gallons) of waste in a calendar month

LQG: > 1000 Kg (~ 300 gallons) of waste in a calendar month or > 1 Kg of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

REMARKS - GENERAL INFORMATION

Process Description:

Chloro Alkali Cell

Potassium Chloride 280 tons \$600,000/month electricity

Brine purification ~~KOH~~ KOH

mercury flowing cathode Chlorine released ~~and~~

$K+Hg$ Dewamp Graphite $\rightarrow H_2O \rightarrow KOH$

Graphite - D009

Waste Management, Generation and Amount: (hazardous and non-hazardous)

^{process}
Clarifier All water goes to clarifier

K106 - filter RO Alkalinity precipitate - K106

D009

Filter Tubes

Hazardous Waste Management Units: (include description of location)

Hoppers for KOH, & K106, D009

Drums waste D009

~~Lab~~ Lab packs

Chloro Picric Sludge Drums

KOH Hopper to drum

roll off Boxes removes several

times a week

Regulatory/Enforcement History: (if applicable)

Has not had RCRA Inspections for long time

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention practices initiated by companies across the state. Asking the company about each bullet point noted below the questions is not necessary. It is only necessary to ask the company the general questions about pollution prevention activities. If the company responds with one of the canned answers below, the appropriate box may be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any pollution prevention activities to reduce the amount of hazardous waste generated? Yes ☒ No ☐ N/A ☐ RMK# ☐

(a) **If so**, what has the company done to minimize hazardous waste generation?

- ☐ A change in the process resulting in less waste
- ☐ A change in the product resulting in less waste
- ☐ Use of fewer and less toxic hazardous raw materials
- ☐ Better operations/improved housekeeping
- ☐ On-site recycling/reuse of hazardous materials
- ☐ Sending waste off-site for recycling/reuse
- ☐ Other activities (specify) _____

Stop 

(b) **If so**, what hazardous wastes have been addressed?

- ☐ Solvents
- ☐ Paint related waste
- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc.)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☐ Fluorescent light bulbs
- ☐ Used batteries
- ☐ Shop rags
- ☐ Other (specify) _____

(c) **If not**, why hasn't the company considered pollution prevention?

- ☐ The company just never thought about it
- ☐ Lack of information about the alternatives that are practical for them
- ☐ Lack of capital to make process changes
- ☐ Lack of internal management support
- ☐ The company does not generate enough hazardous waste to consider pollution prevention
- ☐ Other reason given (specify) _____

2. Does the company plan to do pollution prevention activities in the future?

Yes ☐ No ☐ N/A ☐ RMK# ☐

3. Would the company be interested in receiving additional information from the Ohio EPA about pollution prevention?

Yes ☐ No ☐ N/A ☐ RMK# ☐

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ No ☐ N/A ☐ RMK# 1
2. Has the generator obtained an identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Were annual reports filed with OEPA on or before March 1st? [3745-52-41] Yes ☐ No ☐ N/A ☐ RMK# ☐

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? *If so,* Yes ☐ No ☒ N/A ☐ RMK# ☐
 - (a) Generator notified US EPA of export/import activity [3745-52-53] Yes ☒ No ☒ N/A ☐ RMK# ☐
 - (b) Generator complied with special manifest requirements [3745-52-54] Yes ☐ No ☒ N/A ☐ RMK# ☐
 - (c) For manifests that have not been returned to generator: An exception report has been filed [3745-52-55] Yes ☐ No ☐ N/A ☒ RMK# ☐
 - (d) Annual report submitted to US EPA [3745-52-56] Yes ☒ No ☐ N/A ☒ RMK# ☐
 - (e) Export related documents being maintained on-site [3745-52-57] Yes ☐ No ☐ N/A ☒ RMK# ☐

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection? Yes ☐ No ☒ N/A ☐ RMK# ☐
 - (a) *If so,* describe the unit(s) which the generator has closed:
 - (b) Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☐ RMK# ☐

NOTE: *If the generator has closed a < 90 day tank, closure must be completed also in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

- (c) Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standard:

1. Needs some refining of codes and annual report

LDR REQUIREMENTS

1. Was the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-59-07(A)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
(a) For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-59-07(A)(5)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
(b) For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-59-07(A)(5)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-59-03]
Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-59-09(A)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator determined the correct "treatability group(s)" (e.g. wastewater, non-wastewater, etc.)? [3745-59-07(A)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-59-07(A)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-59-09]
Yes ☒ No ☐ N/A ☐ RMK# ☐
(a) If so, has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-59-09(A)]
Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B)]

7. Does the generator have LDR notification (and certification, where applicable) forms for each shipment of waste? [3745-59-07(A)(1) and (A)(2)]
Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Does each notification/certification form completed contain the following information: [3745-59-07(A)(1) and (A)(2)]
(a) EPA hazardous waste codes for each waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
(b) Appropriate treatment standards for each waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
(c) The manifest number? Yes ☒ No ☐ N/A ☐ RMK# ☐
(d) Waste analysis data, where available? Yes ☒ No ☐ N/A ☐ RMK# ☐
(e) Certification signed by the generator or an authorized representative? (for wastes meeting treatment standards only) Yes ☒ No ☐ N/A ☐ RMK# ☐

MANIFEST REQUIREMENTS

1. All hazardous wastes shipped off-site have been accompanied by a manifest (US EPA form 8700-22) [3745-52-20(A)]

Yes ☒ No ☐ N/A ☐ RMK# ☐

- (a) Item I and items (1) through (20) of each manifest have been completed [3745-52-20(B)]

Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: US EPA form 8700-22(A) (the continuation form) may be needed in addition to form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]

2. Manifest designates at least one permitted disposal facility [3745-52-20(C)]

Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(D)]

3. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility?

Yes ☒ No ☐ N/A ☐ RMK# ☐

- (a) If so, did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)]

Yes ☒ No ☐ N/A ☐ RMK# ☐

4. Manifests have been signed by the generator and initial transporter [3745-52-23(A)(1)(2)]

Yes ☒ No ☐ N/A ☐ RMK# ☐

5. Has the generator received a return copy of each completed manifest within (35) days of being accepted by the transporter? If not,

Yes ☒ No ☐ N/A ☐ RMK# ☐

- (a) Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]

Yes ☐ No ☐ N/A ☐ RMK# ☐

- (b) If the manifest was not received within (45) days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ☐ No ☐ N/A ☐ RMK# ☐

6. Signed copies of all manifests and any exception reports are being retained for at least 3 years [3745-52-40]

Yes ☒ No ☐ N/A ☐ RMK# ☐

REMARKS

1 Returned soln and site filtered soln
for deep well injection
and found chloroform in ~~100~~ or K06
Sent to Alternative facility

LDR REQUIREMENTS- cont.

9. Does the generator produce a waste that is hazardous at the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-59-07(A)(6)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

- (a) *If so*, is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the waste? [3745-59-07(A)(6)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under an NPDES permit, and any characteristic hazardous waste that is rendered nonhazardous via mixing or treatment.*

10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five (5) years? [3745-59-07(A)(7)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

11. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

Yes ☒ No ☒ N/A ☒ RMK# ☒

- (a) *If so*, are treated waste(s) sent to a licensed solid waste disposal facility? *If so*,

Yes ☒ No ☒ N/A ☒ RMK# ☒

- i. Does the generator submit a notification and certification to the director which contains the following:

- a. Name and address of the facility receiving the waste? [3745-59-09(D)(1)(a)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

- b. A description of the waste, including EPA hazardous waste numbers and treatability group? [3745-59-09(D)(1)(b)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

- c. The treatment standards applicable to the waste at the initial point of generation? [3745-59-09(D)(1)(c)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a)? [3745-59-09(D)(2)]

Yes ☒ No ☒ N/A ☒ RMK# ☒

NOTE: *An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10.*

REMARKS

PERSONNEL TRAINING [3745-52-34(A)(4)]

1. The generator keeps records required by 3745-65-16(D) including:

(a) Job titles, as they relate to hazardous waste management, and the name of each employee filling each job

Yes___ No___ N/A___ RMK#___

(b) Job description, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position

Yes___ No___ N/A___ RMK#___

(c) Type and amount of both introductory and continuing training to be given to each person filling a position

Yes___ No___ N/A___ RMK#___

(d) Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B)&(C)

Yes___ No___ N/A___ RMK#___

NOTE: *If the facility's business practices precludes written job titles/ descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Generator has a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions [3745-65-16(A)(2)]

Yes___ No___ N/A___ RMK#___

3. In accordance with 3745-65-16(A)(3), the personnel training program includes instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with:

(a) Emergency procedures

Yes___ No___ N/A___ RMK#___

(b) Emergency equipment

Yes___ No___ N/A___ RMK#___

(c) Emergency systems

Yes___ No___ N/A___ RMK#___

4. Does emergency training described in a, b, & c above include, where applicable: [3745-65-16(A)(3)(a-f)]

(a) Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment

Yes___ No___ N/A___ RMK#___

(b) Key parameters for automatic waste feed cut-off systems

Yes___ No___ N/A___ RMK#___

(c) Communication or alarm systems

Yes___ No___ N/A___ RMK#___

(d) Response procedures for fire/explosions

Yes___ No___ N/A___ RMK#___

(e) Response to ground water contamination incidents

Yes___ No___ N/A___ RMK#___

(f) Shutdown procedures

Yes___ No___ N/A___ RMK#___

5. Personnel training program is directed by a person trained in hazardous waste management procedures as required by 3745-65-16(A)(2)

Yes___ No___ N/A___ RMK#___

PERSONNEL TRAINING - cont.

6. New employees receive training within 6 months after the date of hire (or assignment to a new position) as required by 3745-65-16(B) Yes___ No___ N/A___ RMK#___
7. Annual refresher training is provided to employees as required by 3745-65-16(C) Yes___ No___ N/A___ RMK#___
8. Training records for current personnel are kept until closure of the facility; training records for former employees are kept for at least three years from the date the employee last worked at the facility [3745-65-16(E)] Yes___ No___ N/A___ RMK#___
9. **Optional** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators; drum handlers; emergency coordinators; personnel who conduct hazardous waste inspections; emergency response teams; personnel who prepare manifests, etc.

Job performedName of employeeDate(s) Trained**REMARKS**

CONTINGENCY PLAN [3745-52-34(A)(4)]

1. The facility has a contingency plan which describes the following:
[3745-65-52(A) through (F)]

- (a) Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste Yes ☒ No ☐ N/A ☐ RMK# ☐
- (b) Arrangements/agreements with emergency authorities [3745-65-37] Yes ☒ No ☐ N/A ☐ RMK# ☐
Fire dept - Activates county EMA
- (c) A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator Yes ☒ No ☐ N/A ☐ RMK# ☐
pg 5
- (d) A list of all emergency equipment, including: location, physical description and brief outline of capabilities Yes ☒ No ☐ N/A ☐ RMK# ☐
pg 16
- (e) An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary Yes ☒ No ☐ N/A ☐ RMK# ☐
pg 4

NOTE: If the facility already has a "Spill Prevention, Control and Counter-measures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the OAC requirements. [3745-65-52(B)]

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☐ No ☐ N/A ☐ RMK# ☐
3. A copy of the plan (plus revisions) is kept on-site and has been given to all emergency authorities that might be required to participate in execution of the plan [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
Ash-to-bury Township Fire dept
4. The plan is revised in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the director [3745-65-54] Yes ☒ No ☐ N/A ☐ RMK# ☐
*plan revised 6/99
earlier plan 1/99*

EMERGENCY COORDINATOR

5. An emergency coordinator is available at all times (on-site or on-call) [3745-65-55] Yes ☒ No ☐ N/A ☐ RMK# ☐
*rotating scheme
on-duty manager assumes duties FL*

NOTE: The Emergency Coordinator shall be thoroughly familiar with: a) all aspects of the facility's contingency plan; b) all operations and activities at the facility c) The location and characteristics of waste handled; d) the location of all records within the facility; e) facility layout; and f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

CONTINGENCY PLAN - cont.

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? *If so,*

Yes___ No___ ☒ N/A___ RMK#___

(a) Was the contingency plan implemented? [3745-65-51(B)]

Yes___ No___ N/A ☒ RMK#___

(b) Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?

Yes___ No___ N/A ☒ RMK#___

(c) Did the facility submit a report to the director within (15) days of the incident as required by 3745-65-56(J)?

Yes___ No___ N/A ☒ RMK#___

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health and the environment.

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

- 1. Facility operated to minimize the possibility of fire, explosion, or unplanned release of hazardous waste [3745-65-31]
- 2. If required due to actual hazards associated with the waste, the facility has the following equipment: [3745-65-32(A)(B)(C)(D)]
 - (a) Internal alarm system
 - (b) Emergency communication device
 - (c) Portable fire control, spill control and decon equipment
 - (d) Water of adequate volume/pressure
- 3. Emergency equipment tested (inspected) on a weekly basis and maintained as necessary [3745-65-33] *Monthly basis*
- 4. Emergency equipment tests (inspections) are recorded in a log that includes the following information [3745-65-33(B)]
 - (a) Date and time of test
 - (b) Name of person conducting the test
 - (c) Observations made
 - (d) Date/nature of any repairs
- 5. Personnel have immediate access to a communication device when handling hazardous waste *(unless the device is not required under 3745-65-32)* [3745-65-34]
- 6. Adequate aisle space is provided for unobstructed movement of emergency or spill control equipment [3745-65-35]
- 7. Facility has attempted to familiarize emergency authorities with possible hazards and facility layout [3745-65-37(A)]
 - (a) Where authorities have declined to enter into arrangements/ agreements, the refusal has been documented [3745-65-37(B)]

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <input type="text"/>

REMARKS

GENERATOR ACCUMULATION

Is the generator accumulated hazardous wastes on-site in excess of (90) days without a permit or an extension from the director?
[3745-52-34; ORC 3734.02(E)(F)]

Yes ☒ No ☒ N/A ☐ RMK# ☐

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

Satellite accumulation areas are

- (a) At or near a point of generation?
- (b) Under the control of the operator of the process generating the waste?
- (c) Total quantities of all waste streams do not exceed 55 gallons
- (d) Quantities of acutely hazardous waste do not exceed 1 quart at any one time
- (e) Containers are marked with words "Hazardous Waste" or other words identifying the contents

Yes ☒ No ☐ N/A ☐ RMK# ☐

Yes ☒ No ☐ N/A ☐ RMK# ☐

Yes ☐ No ☐ N/A ☐ RMK# ☐

Yes ☐ No ☐ N/A ☒ RMK# ☐

Yes ☐ No ☒ N/A ☐ RMK# ☐

not all containers

NOTE: The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to the Ohio EPA November 1994 Guidance on the Location of Satellite Accumulation Areas.

Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? *If so,*

Yes ☐ No ☐ N/A ☐ RMK# ☐

(a) Did the generator comply with 3745-52-34(A) or other applicable generator requirements within (3) days? **and;**

Yes ☒ No ☐ N/A ☐ RMK# ☐

(b) Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (1 quart) limit was exceeded?

Yes ☐ No ☐ N/A ☐ RMK# ☐

USE AND MANAGEMENT OF CONTAINERS

Containers are marked with the words "Hazardous Waste"
[3745-52-34(A)(3)]

Yes ☐ No ☒ N/A ☐ RMK# ☐

not all containers

Accumulation date is on each container [3745-52-34(A)(2)]

Yes ☐ No ☐ N/A ☐ RMK# ☐

Are hazardous wastes stored in containers which are:

(a) Closed (except when adding/removing wastes) [3745-66-73(A)]

Yes ☐ No ☐ N/A ☐ RMK# ☐

(b) In good condition [3745-66-71]

Yes ☒ No ☐ N/A ☐ RMK# ☐

(c) Compatible with wastes stored in them [3745-66-72]

Yes ☒ No ☐ N/A ☐ RMK# ☐

(d) Handled in a manner which prevents rupture/leakage [3745-66-73(B)]

Yes ☐ No ☒ N/A ☐ RMK# ☐

Is the container accumulation area(s) inspected weekly [3745-66-74]
(Note location in General Information section of checklist)

Yes ☐ No ☐ N/A ☐ RMK# ☐

1. Hoppers moved to rolloff Box when full within 1 day

4. Inspection
Checklist recent development
6-2-99

CONTAINER MANAGEMENT -1-

2 Hoppers were labeled on 25 but were on 24. 2 hoppers handle solid solids and it moved

8. Are inspections described in Question #7 recorded in a log which contains the following information: [3745-66-74(B)]

Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u>1</u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>

- (a) Date and time of inspection *Date not time*
- (b) Name of inspector
- (c) Observations made during the inspection
- (d) Date/nature of any repairs or remedial action

9. For ignitable and/or reactive hazardous waste(s):

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK# <u> </u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>

- (a) Containers are located at least 50 feet (15 meters) from the facility's property line [3745-66-76]
- (b) Containers are stored separately from other materials which may interact with the waste in a hazardous manner [3745-66-77(C)]

PRE-TRANSPORT REQUIREMENTS

- 10. Waste is packaged/labeled in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]
- 11. Each container < 110 gallons has a completed hazardous waste label [3745-52-32(B)]
- 12. Before off-site transportation, generator placards ~~or~~ offers the appropriate DOT placards to the initial transporter [3745-52-33]

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# <u> </u>

REMARKS

1. *Date on Weekly Checklist
time not on Checklist*

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

1. Specify the type of tank system(s) used for hazardous waste management and if secondary containment (where required) has been provided:

NOTE: *New Tank System - Installation commencing after July 14, 1986.*
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

<p>(a) New tank system(s)? [3745-66-93(A)(1)] <i>If so,</i></p> <p style="margin-left: 40px;">i. Has secondary containment been provided?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>(b) Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027? [3745-66-93(A)(2)] <i>If so,</i></p> <p style="margin-left: 40px;">i. Has secondary containment been provided?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>(c) Existing tank system(s) of known (documentable) age which is 15 years or greater? [3745-66-93(A)(3)] <i>If so,</i></p> <p style="margin-left: 40px;">i. Has secondary containment been provided?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>(d) Existing tank system(s) of known (documentable) age which is less than 15 years? [3745-66-93(A)(3)]</p> <p style="margin-left: 40px;">[Secondary containment not required until tank reaches 15 years of age]</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>(e) Existing tank system(s) for which the age cannot be documented? [3745-66-93(A)(4)] <i>If so,</i></p> <p style="margin-left: 40px;">i. Has secondary containment been provided?</p> <p style="margin-left: 40px;">[Secondary containment is required for all existing tank systems for which the age cannot be documented. The tanks were required to have secondary containment when the facility turned 15 years, or by January 12, 1995.]</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>2. Is the tank system used to manage a material that became a hazardous waste after January 12, 1987? [3745-66-93(A)(5)] <i>If so,</i></p> <p style="margin-left: 40px;">(a) Has secondary containment been provided?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>

NOTE: *Secondary containment is required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1989.*

NOTE: *If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 5 of this Tank Systems Checklist.*

3. Is the secondary containment one of the following:

(a) An **External Liner**? [3745-66-93(E)(1)(a) - (1)(f)] *If so,*

Yes___ No___ N/A___ RMK#___

- i. Is liner designed or operated to contain 100% of the capacity of the largest tank?
- ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on & infiltration from a 25-year, 24-hour storm?
- iii. Is liner free of cracks and gaps?
- iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?
- v. Are chemically resistant water stops in place at all joints? *(concrete liners only)*
- vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)*

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

(b) **Vault System**? [3745-66-93(E)(2)(a) - (2)(f)] *If so,*

- i. Is vault system designed to contain 100% of the capacity of the largest tank?
- ii. Is vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
- iii. Are chemically resistant water stops in place at all joints?
- iv. Is there a compatible interior coating to prevent migration into the concrete?
- v. For **ignitable or reactive waste**: is the vault system provided with means to prevent against the formation or ignition of vapors?
- vi. Is vault system provided with an exterior moisture barrier?

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

(c) **Double-Walled Tank**? [3745-66-93(E)(3)(a) - (3)(c)] *If so,*

- i. Is double-walled tank designed as an integral structure to contain any release from the inner tank?
- ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?
- iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

4. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)]

Yes___ No___ N/A___ RMK#___

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

5. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)]

Yes___ No___ N/A___ RMK#___

6. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

- (a) Constructed or lined with compatible materials of sufficient strength to prevent failure?

Yes___ No X N/A___ RMK#___

- (b) Placed on a foundation or base capable of providing support?

Yes___ No___ N/A___ RMK# 1

- (c) Provided with a leak detection system designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?

Yes___ No X N/A___ RMK#___

- (d) Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?

Yes X No___ N/A___ RMK#___

- (e) Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?

Yes___ No___ N/A___ RMK#___

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

7. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?
If not, is the ancillary equipment:

Yes___ No___ N/A___ RMK# 2

- (a) Inspected daily? **AND**;

Yes___ No___ N/A___ RMK#___

- (b) Is ancillary equipment one of the following;

- i. Above ground piping (exclusive of flanges, joints, valves and connections)?
- ii. Welded flanges, welded joints and/or welded connections?
- iii. Sealless or magnetic coupling pumps and/or sealless valves?
- iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)?

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

Yes___ No___ N/A___ RMK#___

REMARKS

1 not available
2 piping within diked area

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]

Yes	No	N/A	RMK#
-----	----	-----	------

2. Does the written assessment include the following:
[OAC 3745-66-92(A)]
 - (a) Certification by an independent, registered, professional engineer?

Yes	No	N/A	RMK#
-----	----	-----	------
 - (b) Consideration of the design standards of the system?

Yes	No	N/A	RMK#
-----	----	-----	------
 - (c) Consideration of the hazardous characteristics of the waste(s)?

Yes	No	N/A	RMK#
-----	----	-----	------
 - (d) An evaluation by a corrosion expert *(if the external system/components are metal)?*

Yes	No	N/A	RMK#
-----	----	-----	------
 - (e) A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)?*

Yes	No	N/A	RMK#
-----	----	-----	------
 - (f) Design considerations to ensure that the tank foundations will maintain the load of a full tank?

Yes	No	N/A	RMK#
-----	----	-----	------
 - (g) Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)?*

Yes	No	N/A	RMK#
-----	----	-----	------
 - (h) Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)?*

Yes	No	N/A	RMK#
-----	----	-----	------

3. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]

Yes	No	N/A	RMK#
-----	----	-----	------

Do the written statements address all of the following:

 - (a) Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]

Yes	No	N/A	RMK#
-----	----	-----	------
 - (b) Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]

Yes	No	N/A	RMK#
-----	----	-----	------
 - (c) Proper backfilling? [3745-66-92(C)]

Yes	No	N/A	RMK#
-----	----	-----	------
 - (d) Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]

Yes	No	N/A	RMK#
-----	----	-----	------
 - (e) Proper support and protection of ancillary equipment? [3745-66-92(E)]

Yes	No	N/A	RMK#
-----	----	-----	------
 - (f) Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]

Yes	No	N/A	RMK#
-----	----	-----	------

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

(a) Spill control equipment (daily)? [3745-66-95(A)(1)]	Yes___	No <input checked="" type="checkbox"/>	N/A___	RMK#___
(b) Above ground portion of tank (daily)? [3745-66-95(A)(2)]	Yes___	No <input checked="" type="checkbox"/>	N/A___	RMK#___
(c) Data from leak detection equipment (daily)? [3745-66-95(A)(3)]	Yes___	No <input checked="" type="checkbox"/>	N/A___	RMK#___
(d) Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)]	Yes___	No <input checked="" type="checkbox"/>	N/A___	RMK#___
(e) Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)]	Yes___	No___	N/A___	RMK#___
(f) Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]	Yes___	No___	N/A___	RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)]
- (a) Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)] **OR**;
- (b) Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)] **OR**;
- (c) The tank is used solely for emergencies? [3745-66-98(A)(3)]

Yes___	No___	N/A___	RMK#___
Yes___	No___	N/A___	RMK#___
Yes___	No___	N/A___	RMK#___

NOTE: *Generators are not allowed to treat wastes (other than elementary neutralization) on-site without a permit.*

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Code (1977 or 1981)? [3745-66-98(B)]

Yes___	No___	N/A___	RMK#___
--------	-------	--------	---------

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99]

Yes___	No___	N/A___	RMK#___
--------	-------	--------	---------

- (a) *If so*, have the requirements of 3745-65-17(B) been met?

Yes___	No___	N/A___	RMK#___
--------	-------	--------	---------

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)]

(a) Design standards? [3745-66-91(B)(1)]

Yes___ No___ N/A___ RMK#___

(b) The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)]

Yes___ No___ N/A___ RMK#___

(c) Corrosion protection measures? [3745-66-91(B)(3)]

Yes___ No___ N/A___ RMK#___

(d) The age of the tank system has been estimated or documented? [3745-66-91(B)(4)]

Yes___ No___ N/A___ RMK#___

(e) A leak test has been conducted? (*For non-enterable underground tanks*) [3745-66-91(B)(5)(a)]

Yes___ No___ N/A___ RMK#___

(f) A leak test or an internal inspection by qualified P.E. has been conducted? (*For other than non-enterable underground tanks and for ancillary equipment*) [3745-66-91(B)(5)(b)]

Yes___ No___ N/A___ RMK#___

(g) Is assessment certified by independent, registered, P.E.? [3745-66-91(A)]

Yes___ No___ N/A___ RMK#___

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(l)] *If so,*

Yes___ No___ N/A___ RMK#___

(a) Have tests been certified by independent, registered, P.E.?

Yes___ No___ N/A___ RMK#___

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)]

Yes___ No___ N/A___ RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

(a) Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail. [3745-66-94(A)]

Yes___ No ☒ N/A___ RMK#___

(b) Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)]

Yes___ No ☒ N/A___ RMK#___

(c) If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]

Yes___ No ☒ N/A___ RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-991)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] Yes___ No___ N/A___ RMK#___
- (a) Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)] **OR**; Yes___ No___ N/A___ RMK#___
- (b) Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)] Yes___ No___ N/A___ RMK#___

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? *If so*, did the o/o: Yes ☒ No___ N/A___ RMK#___
- (a) Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes ☒ No___ N/A___ RMK#___
- (b) Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes ☒ No___ N/A___ RMK#___
- (c) Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes ☒ No___ N/A___ RMK#___
- (d) Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes ☒ No___ N/A___ RMK#___
- (e) Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes ☒ No___ N/A___ RMK#___
- (f) Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes ☒ No___ N/A___ RMK#___
- (g) Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes___ No___ N/A___ RMK#___
- (h) Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(3)] Yes___ No___ N/A___ RMK#___
- (i) Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes___ No___ N/A___ RMK#___
- (j) For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes___ No___ N/A___ RMK#___

NOTE: *The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes___ No___ N/A___ RMK#___
- (a) Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)] Yes___ No___ N/A___ RMK#___
3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes___ No___ N/A___ RMK#___
4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? **If so,** Yes___ No___ N/A___ RMK#___
- (a) Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes___ No___ N/A___ RMK#___
- (b) If soils cannot be decontaminate/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes___ No___ N/A___ RMK#___
5. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred and has migrated from the zone of engineering control? **If so,** Yes___ No___ N/A___ RMK#___
- (a) Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes___ No___ N/A___ RMK#___
- (b) If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes___ No___ N/A___ RMK#___

REMARKS

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Waste, Pesticides & Toxics Division
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